

Mr. Chris Berg
Jasper Seating Company, Inc.
P.O. Box 231
Jasper, Indiana 47547-0231

Re: 037-11989
Minor Permit Modification to
Title V Permit No.: 037-5994-00017

Dear Mr. Berg:

Dolly Madison Furniture Inc. (DMI) – Plant #4 was issued a Part 70 Operating Permit (Title V) on January 25, 1999 for a wood furniture manufacturing facility. Ownership of this property was transferred to Jasper Seating Company on January 28, 2000. A letter requesting changes to the permit was received on March 9, 2000. Jasper Seating has requested that the woodworking operations be removed from Section D.2 of the issued Title V permit.

The permit lists woodworking operations as insignificant in Section A.3. The woodworking operations are considered to be insignificant woodworking operations pursuant to 326 IAC 2-7-1(21)(G)(xxx) and have applicable requirements. Therefore, these operations will not be removed from Section D.2 of the permit.

Since there are no units being installed and emissions remain unaffected, then pursuant to 326 IAC 2-7-12(b), this modification is considered a Minor Permit Modification. Pursuant to 326 IAC 2-7-12(b), the following changes have been made to the permit to identify the correct corresponding requirements for insignificant woodworking operations (bolded language has been added, the language with a line through it has been deleted):

SECTION D.2 FACILITY OPERATION CONDITIONS – Woodworking operations

Facility Description [326 IAC 2-7-5(15)]

Insignificant Activities:

One (1) woodworking operation with a maximum throughput of 3810 pounds per hour. Emissions shall be controlled by one baghouse, and exhausted at three (3) stacks, identified as 04BH1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxx)]

~~The baghouse does not exceed to the atmosphere greater than one hundred twenty-five thousand (125,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of three-thousandths (0.003) grain per dry standard cubic foot of outlet air. The requirements of this condition will also satisfy the requirements of 326 IAC 6-1-2.~~

The woodworking operations controlled by a baghouse shall be an insignificant activity for Part 70 permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxx), including the following:

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic foot of outlet air.**
- (b) The opacity from each baghouse shall not exceed ten percent (10%).**
- (c) Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:**
 - (1) The baghouse shall be inspected.**
 - (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.**

D.2.2 Opacity

The opacity from the woodworking operations shall not exceed 10% when vented to the atmosphere.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Opacity

Testing with this facility is not required by this permit. However, if testing is required, compliance with the limitations in Condition D.2.2 shall be determined by 40 CFR 60, Appendix A, Method 9.

D.2.6 Particulate Matter (PM)

The baghouse for PM control shall be in operation at all times when the woodworking machinery is in operation.

D.2.87 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxx)(FF)]

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter.

Inspections are optional when venting to the indoors. All defective bags shall be replaced.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.2.78 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.9 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

- (a) To document compliance with Condition **D.2.2(c)** or Condition **D.2.78**, the Permittee shall maintain records of daily visible emission notations of the woodworking baghouse stack exhaust.
- (b) To document compliance with Condition **D.2.87** the Permittee shall maintain records of the results of the inspections required under Condition **D.2.87** and the dates the vents are redirected.
- (c) **The Permittee shall maintain records of corrective actions to document compliance**

with 326 IAC 2-7-21(1)(G)(xxx)(GG)(dd).

~~(c)~~ **(d)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

If you have any questions on this matter, please call Kimberly Titzer at (800) 451-6027, press 0 and ask for extension 3-8396, or dial (317) 233-8396.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

kt

cc: File - Dubois County
Air Compliance – Ray Schick
Permit Tracking - Janet Mobley

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Jasper Seating Company, Inc.
(formerly DMI Furniture, Inc. Plant #4)
5th and Virginia Street
Ferdinand, Indiana 47532**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T037-5994-00017	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: January 25, 1999

First Minor Permit Modification No.: 037-11989	
Revised pages: 34,35 added page 35a	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION D.2

FACILITY OPERATION CONDITIONS – Woodworking operations

Facility Description [326 IAC 2-7-5(15)]

Insignificant Activities:

One (1) woodworking operation with a maximum throughput of 3810 pounds per hour. Emissions shall be controlled by one baghouse, and exhausted at three (3) stacks, identified as 04BH1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxx)]

The woodworking operations controlled by a baghouse shall be an insignificant activity for Part 70 permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxx), including the following:

- (a) Each woodworking baghouse shall not exhaust to the atmosphere greater than forty thousand (40,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of one-hundredth (0.01) grain per dry standard cubic foot of outlet air.
- (b) The opacity from each baghouse shall not exceed ten percent (10%).
- (c) Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:
 - (1) The baghouse shall be inspected.
 - (2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

D.2.2 Opacity

The opacity from the woodworking operations shall not exceed 10% when vented to the atmosphere.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Opacity

Testing with this facility is not required by this permit. However, if testing is required, compliance with the limitations in Condition D.2.2 shall be determined by 40 CFR 60, Appendix A, Method 9.

D.2.6 Particulate Matter (PM)

The baghouse for PM control shall be in operation at all times when the woodworking machinery is in operation.

D.2.7 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxx)(FF)]

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.2.8 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.9 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2(c) or Condition D.2.8, the Permittee shall maintain records of daily visible emission notations of the woodworking baghouse stack exhaust.
- (b) To document compliance with Condition D.2.7 the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.
- (c) The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxx)(GG)(dd).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.